

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

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(Admission *pro hac vice* pending)

PROPOSED ATTORNEYS FOR DEBTOR

In re:

LTL MANAGEMENT LLC,¹

Debtor.

Chapter 11

Case No.: 23-12825 (MBK)

Judge: Michael B. Kaplan

APPLICATION FOR ORDER SHORTENING TIME

TO: THE HONORABLE MICHAEL B. KAPLAN
CHIEF UNITED STATES BANKRUPTCY JUDGE

The above-captioned debtor (the “Debtor”), by and through its undersigned counsel,
requests that the time period to notice a hearing on the *Debtor’s Motion for an Order*

(I) Appointing Co-Mediators, (II) Establishing Mediation Procedures and (III) Granting Related

¹ The last four digits of the Debtor’s taxpayer identification number are 6622. The Debtor’s address is 501 George Street, New Brunswick, New Jersey 08933.

Relief (the “Motion”)² as required by D.N.J. LBR 9013-2(a) be shortened pursuant to Fed. R. Bankr. P. 9006(c)(1), for the reasons set forth below:

1. A shortened hearing time is requested because: The Debtor filed this Chapter 11 Case after it reached an agreement with more than 60,000 claimants on the material terms of a plan of reorganization that, if confirmed and consummated, would fully resolve all the Debtor’s liability for talc-related claims. See First Day Decl. ¶¶ 72-73. To achieve a prompt resolution, the Debtor intends immediately to engage in good faith negotiations with its key constituencies, including the future claimants’ representative that is appointed in this Chapter 11 Case, the Debtor’s insurers and other talc claimants, to finalize the terms of a plan of reorganization consistent with the terms set forth in the plan support agreements and file a plan by May 14, 2023, or as soon thereafter as feasible, as required by the plan support agreements.

Accordingly, the Debtor believes it is appropriate for the Court to consider the Motion on an expedited basis so that the parties may resume efforts to consensually resolve this case as soon as possible. As set forth in the Motion, to facilitate a prompt resolution, the appointment of the Co-Mediators is essential given their familiarity with the Mediation Issues and the parties. Further, approving, on an expedited basis, the same mediation procedures that the parties agreed to, and the Court approved, in the 2021 Chapter 11 Case will permit discussions to move forward without delay.

2. State the hearing dates requested: The Debtor respectfully requests that the Court hear the Motion on April 18, 2023, or on a date and time which is most convenient for the Court.

3. Reduction of the time period is not prohibited under Fed. R. Bankr. P 9006(c)(1).

The applicant requests entry of the proposed order shortening time.

² Capitalized terms not otherwise defined herein have the meanings given to them in the Motion.

Dated: April 10, 2023

WOLLMUTH MAHER & DEUTSCH LLP

/s/ Paul R. DeFilippo

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